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Attorneys for Defendants
RELATED MANAGEMENT COMPANY, L.P.
(*incorrectly sued as The Related Companies, Inc.*)
and THIRD AND MISSION ASSOCIATES, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PETER HOLLAND and KRISTEN
HOLLAND,

Plaintiffs,

v.

THE RELATED COMPANIES, INC.;
THIRD AND MISSION ASSOCIATES,
LLC; DOES 1 through 10, inclusive

Defendants.

Case No. 4:15-CV-03220 JSW

Hon. Judge Jeffery S. White

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING DEADLINES SET
IN OCTOBER 2, 2015 CASE
MANAGEMENT ORDER (DKT. NO. 45)
AS MODIFIED HEREIN**

By and through their attorneys of record, Defendants THIRD AND MISSION ASSOCIATES, LLC and RELATED MANAGEMENT COMPANY, L.P. (*incorrectly sued as The Related Companies, Inc.*) (“Defendants”) and Plaintiffs PETER HOLLAND and KRISTIN HOLLAND (“Plaintiffs”) hereby stipulate and agree as follows:

WHEREAS, the Court entered a scheduling order on October 2, 2015 (dkt. No. 45) setting case deadlines pursuant to stipulation of the parties;

WHEREAS, the Court approved the substitution of Kasowitz, Benson, Torres & Friedman LLP in place of Kimball, Tirey & St. John LLP as Defendants’ counsel of record on December 18, 2015;

WHEREAS, Defendants’ new lead counsel, Lyn Agre, represents witnesses in a matter pending before the Honorable Charles R. Breyer in the United States District Court for the Northern District of California (*United States v. Federal Express Corporation*, Case No. 14-CR-380), which is set for trial on July 13, 2016 and expected to last several months;

WHEREAS, Defendants’ new counsel and Plaintiffs’ counsel have met and conferred, and agree that extension of certain of the deadlines in the current scheduling order is warranted.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto and their respective undersigned attorneys, as follows:

The parties respectfully jointly request that the Court continue the deadlines set forth in the October 2, 2015 Case Management Order as follows:

Discovery Cut-off	May 2, 2016
Designation of experts	May 2, 2016
Expert discovery cut-off	May 31, 2016
Hearing of dispositive motions	July 8, 2016
Pretrial conference	September 26, 2016
Jury selection & trial	October 31, 2016

Respectfully submitted,

DATED: January 14, 2016

/s/ Lyn R. Agre

Lyn R. Agre
KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

Attorneys for Defendants
THIRD AND MISSION ASSOCIATES, LLC and
RELATED MANAGEMENT COMPANY, L.P.
(*incorrectly sued as The Related Companies, Inc.*)

DATED: January 14, 2016

/s/ Steven L. Derby

Steven L. Derby
THE DERBY LAW FIRM P.C.

Attorneys for Plaintiffs
PETER HOLLAND and
KRISTEN HOLLAND

DATED: January 14, 2016

/s/ Celia McGuinness

Paul L. Rein
Celia McGuinness
Catherine Cabalo
LAW OFFICES OF PAUL L. REIN

Attorneys for Plaintiffs
PETER HOLLAND and
KRISTEN HOLLAND

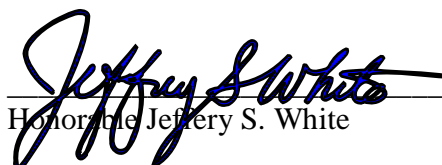
PROPOSED ORDER

Pursuant to the parties' stipulation, it is hereby ordered that the deadlines set forth in the October 2, 2015 Case Management Conference Order are vacated and reset as follows:

Discovery Cut-off	May 2, 2016
Designation of experts	May 2, 2016
Expert discovery cut-off	May 31, 2016
Hearing of dispositive motions	July 8, 2016
Pretrial conference	September 26, 2016 at 2:00 p.m.
Jury selection	October 26, 2016 at 8:00 a.m.
Jury selection & trial Trial	October 31, 2016 at 8:00 a.m.

IT IS SO ORDERED.

DATED: January 15, 2016


Honorable Jeffery S. White